

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

BERT MEYER,) Civil No.: CV04 00049 JMS-BMK
Plaintiff,) (In Admiralty)
vs.)
MATSON NAVIGATION) DECLARATION OF THOMAS E.
COMPANY, INC.; and PACIFIC) IRONS; EXHIBITS "A" - "H"
LIVESTOCK, INC.,)
Defendants.)
)

DECLARATION OF THOMAS E. IRONS

I, THOMAS E. IRONS, hereby declare:

1. I am one of the attorneys representing Defendant Pacific Livestock, Inc. ("PLI"), and have personal knowledge herein.
2. I am an attorney with Hughes & Taosaka, and am licensed to practice law before the courts of the State of Hawaii.
3. Attached hereto as Exhibit "A" is a true and correct copy of records obtained via PLI's discovery requests to Matson Navigation Company, Inc. ("Navigation").
4. Attached hereto as Exhibit "B" is a true and correct copy of excerpts of Captain Robert Riley's deposition.

5. Attached hereto as Exhibit "C" is a true and correct copy of excerpts of Eric Johnson's deposition.

6. Attached hereto as Exhibit "D" is a true and correct copy of the Vessel Safety Inspection Report dated October 1, 2002 which was submitted as Exhibit "1" to the Declaration of John Robinette in connection with Navigation's motion for summary judgment filed January 11, 2006.

7. Attached hereto as Exhibit "E" is a true and correct copy of Navigation's tender for defense and indemnification.

8. Attached hereto as Exhibit "F" is a true and correct copy of excerpts from Plaintiff's deposition.

9. Attached hereto as Exhibit "G" is a true and correct copy of excerpts of Navigation's discovery responses to Plaintiff, Set One.

10. Attached hereto as Exhibit "H" is a true and correct copy of documents I downloaded from Navigation's website on November 28, 2005.

I declare under penalty of perjury that the foregoing is true and correct.

DATED at Honolulu, Hawaii MAR 30 2006.


THOMAS E. IRONS